

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Case No. 18-cv-1776 (JRT/JFD)

Honorable Judge R. Tunheim

This Document Relates to:
All Class Actions

**DECLARATION OF
LINDSEY STRANG ABERG IN SUPPORT OF
DEFENDANTS' OMNIBUS MEMORANDUM IN OPPOSITION TO
ALL CLASS PLAINTIFFS' MOTIONS FOR CLASS CERTIFICATION**

I, Lindsey Strang Aberg, declare and state:

1. I am an attorney with the law firm Axinn, Veltrop & Harkrider LLP, which represents Defendants Tyson Foods, Inc., Tyson Fresh Meats, Inc., and Tyson Prepared Foods, Inc. in this matter.

2. The exhibits cited in support of the Omnibus Memorandum in Opposition to All Class Plaintiffs' Motions for Class Certification are set forth in the chart below. True and correct copies of these exhibits are attached hereto. All deposition transcripts referenced have been limited to the relevant portions cited in support of the Omnibus Opposition. As required by the Amended Protective Order (ECF No. 1155), any exhibits that have been designated as Confidential or Highly Confidential will be filed under seal and are denoted as such in the chart below.

Ex.	Description	Filed Under Seal
1	Expert Report of Dr. Laila Haider	X
2	Expert Report of Dr. James Mintert	X
3	30(b)(6) & 30(b)(1) Dep. Tr. USDA (Shayle Shagam), June 1, 2022	
4	30(b)(6) & 30(b)(1) Dep. Tr. USDA (Taylor Cox), June 2, 2022	
5	30(b)(1) Dep. Tr. Dwight Mogler, July 22, 2022	X
6	30(b)(1) Dep. Tr. Ronald Freed, July 28, 2022	X
7	30(b)(1) Dep. Tr. Ronald Freed, July 28, 2022, Ex. 1 (CLMNS-0000651270)	X
8	30(b)(1) Dep. Tr. Dr. Steve Meyer, Apr. 26, 2022	
9	30(b)(1) Dep. Tr. Todd Neff, July 15, 2022	X
10	30(b)(1) Dep. Tr. Daniel Groff, Dec. 15, 2021, Ex. 9 (CLMNS-0000030358)	X
11	30(b)(6) & 30(b)(1) Dep. USDA (Shayle Shagam), June 1, 2022, Ex. 7	
12	30(b)(6) & 30(b)(1) Dep. USDA (Shayle Shagam), June 1, 2022, Ex. 8	
13	Hearing to Review the Econ. Conditions in the Pork Indus. Before the Subcomm. on Livestock, Dairy & Poultry, H. Comm. on Agric., 111th Cong. (2009).	
14	30(b)(1) Dep. Tr. Seth Meyer, June 15, 2022	
15	Pork Checkoff, Quick Facts: The Pork Industry at a Glance, Pork Gateway (July 2015), https://porkgateway.org/wp-content/uploads/2015/07/quick-facts-book1.pdf .	
16	30(b)(1) Dep. Tr. Dr. Russell Mangum, III (DPP Expert), July 13, 2022	X
17	30(b)(1) Dep. Tr. Noel White, May 13, 2022	X
18	CLMNS-0000453599	X
19	30(b)(1) Dep. Tr. Corwyn Bollum, Dec. 1, 2021	X
20	HFC-PORKAT0000253865	X
21	30(b)(1) Dep. Tr. Rick Hoffman, Apr. 26, 2022	

Ex.	Description	Filed Under Seal
22	TF-P-000779204 ¹	X
23	30(b)(1) Dep. Tr. Rodney Brenneman, Aug. 4, 2022	X
24	30(b)(1) Dep. Tr. Daniel Groff, Dec. 15, 2021	
25	30(b)(6) & 30(b)(1) Dep. USDA (Shayle Shagam), June 1, 2022, Ex. 2	
26	30(b)(6) & 30(b)(1) Dep. USDA (Shayle Shagam), June 1, 2022, Ex. 3	
27	Univ. Mo. Food & Agric. Pol'y Rsch. Inst., U.S. Baseline Briefing Book, Feb. 2007	
28	Univ. Mo. Food & Agric. Pol'y Rsch. Inst., U.S. Baseline Briefing Book, Mar. 2009	
29	30(b)(1) Dep. Tr. Dr. Dhamu Thamodaran, Mar. 23, 2022	
30	30(b)(1) Dep. Tr. Dr. Michael Williams (CIIPP expert), June 21, 2022	X
31	Written Testimony of Nat'l Pork Producers Council on State of the U.S. Pork Indus., Subcomm. on Livestock, Rural Dev. & Credit, Apr. 30, 2014	
32	30(b)(1) Dep. Tr. Mark Copa, Jan. 27, 2022	
33	30(b)(6) & 30(b)(1) Dep. USDA (Shayle Shagam), June 1, 2022, Ex. 21	
34	30(b)(1) Dep. Seth Meyer, June 15, 2022, Ex. 8	
35	U.S. Meat Export Fed'n Staff, <i>China's pork imports record large in 2015</i> , Nat'l Hog Farmer (Feb 15, 2016), https://www.nationalhogfarmer.com/marketing/china-s-pork-imports-record-large-2015	
36	30(b)(1) Dep. Tr. Shane Miller, May 26, 2022	X
37	30(b)(1) Dep. Tr. Deborah McConnell, June 23, 2022	X
38	30(b)(1) Dep. Tr. Dr. Hal Singer (Consumer IPP expert), June 24, 2022	X
39	30(b)(1) Dep. Tr. David Delaney, Apr. 20, 2022	
40	30(b)(1) Dep. Tr. Robert Ruth, May 13, 2022	

¹ Copy of pivot table from produced file provided as the native structured data file in Microsoft Excel file is not able to be converted to PDF in a cognizable form. Counsel will produce the native file upon request.

Ex.	Description	Filed Under Seal
41	SBF0821978	X
42	TF-P-002610513	X
43	30(b)(1) Dep. Tr. Kenneth Grannas Dec. 17, 2021	X
44	30(b)(1) Dep. Tr. Mark Gingerich Apr. 14, 2022	X
45	30(b)(1) Dep. Tr. Dr. Michael Williams (CIIPP expert), June 21, 2022, Ex. 5	X
46	Steve Meyer, Hog Cycle: Misery Loves Company, National Hog Farmer (Jan. 18, 2008), https://www.nationalhogfarmer.com/marketing/hog-cycle	
47	TF-P-000066957	X
48	TF-P-000633968	X

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 24th day of August 2022 in Washington D.C.

/s/ Lindsey Strang Aberg
Lindsey Strang Aberg